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April 30, 2019

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
Martin Luther King Courthouse
50 Walnut Street
Newark, New Jersey 07101

**RE: O'Connor v. The Dodge Company et al.
Civil Action No.: 2:16-cv-05177 (JLL) (JAD)
Our File No. 3378G-0002**

Dear Magistrate Dickson:

This office represents the Defendant, The Dodge Company, Inc., in the above matter. As Your Honor may recall, all counsel participated in a telephonic Case Management Conference on March 25, 2019. At the Court's request, we were instructed to prepare a Case Management Order following the call. We apologize for the delay in submitting the proposed Case Management Order for Your Honor's review and consideration. The reason for the delay is due to the fact that on April 5, 2019, Plaintiffs' counsel produced outstanding documents related to the medical malpractice matter. Due to the volume of documents, it took defense counsel several weeks to review same to ascertain whether or not it was sufficiently responsive or not before determining if the Case Management Order should include a provision related to outstanding discovery. Please be advised that all parties have reviewed the enclosed Case Management Order and to date, there are no objections to same. We appreciate Your Honor's consideration in this matter.

Respectfully submitted,
McGIVNEY, KLUGER & COOK, P.C.

/s/ Emily R. Weisslitz

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ERW:ml
Enclosure
VIA ECF

cc: Honorable Jose L. Linares, U.S.D.J.
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